

DANIEL G. BOGDEN
United States Attorney
District of Nevada
BLAINE T. WELSH
Assistant United States Attorney

BENJAMIN MIZER
Principal Deputy Assistant Attorney General
WILLIAM C. PEACHEY
Director, Office of Immigration Litigation-DCS
WILLIAM C. SILVIS
Assistant Director
T. MONIQUE PEOPLES
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation-DCS
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Phone: (202) 598-8717
Facsimile: (202) 305-7000
Email: monique.peoples@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MATTHEW OBIM OKEKE,)	
)	
Petitioner,)	Case No. 2:15-cv-02178-APG-PAL
)	
v.)	
)	
JEH JOHNSON, Secretary of U.S.)	
Department of Homeland Security, <i>et al.</i> ,)	
)	
Respondents.)	

JOINT STIPULATION FOR EXTENSION OF DEADLINE TO ANSWER PETITION
(Second Request)

Pursuant to LR 6-1, 6-2, and 7-1, the parties jointly stipulate to extend the deadline for Respondents to answer or otherwise respond to the Petition filed in this matter. In support, the parties state as follows:

1 1. On November 16, 2015, Petitioner filed a petition for writ of mandamus. *See*
2 Pet., ECF No. 1. Specifically, Petitioner seeks an order from the Court “to compel
3 Respondents to act on Petitioner’s completed I-485 Application to Adjust Status.” *Id.* at ¶ 1.

4 2. Although Plaintiff completed service on Respondents on February 1, 2016, the
5 civil docket entry notation originally indicated that Respondents’ answer deadlines were
6 February 1 and 2, 2016. *See* Dkt. entry at ECF No. 8. The parties therefore stipulated and
7 agreed that good cause existed to correct Respondents’ answer deadline from the deadlines
8 noted on ECF No. 8 to the correct answer date of April 1, 2016. *See* ECF No. 9; Fed. R. Civ.
9 P. 12(a)(2). The Court approved the parties’ first stipulation and Respondents’ current answer
10 deadline is April 1, 2016. *See* ECF No. 11.

11 3. On January 8, 2016, the United States Citizenship and Immigration Services
12 (“USCIS”) issued Petitioner a Request for Evidence pertaining to his I-485 Application to
13 Adjust Status, requesting that certain materials be submitted to USCIS by April 4, 2016. Upon
14 its receipt of the requested materials, USCIS may require additional time beyond Respondents’
15 April 1 answer deadline to review those materials and adjudicate Petitioner’s I-485 application.
16 Good cause therefore exists to allow USCIS additional time to review and process Petitioner’s
17 I-485 application, which could potentially resolve the issues in the Petition without further
18 litigation.

19 4. Accordingly, the parties stipulate and agree that good cause exists to extend
20 Respondents’ answer deadline by thirty days from April 1, 2016, to May 2, 2016.

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1 WHEREFORE, the parties stipulate and agree that good cause exists to extend
2 Respondents' answer deadline by thirty days from April 1, 2016, to May 2, 2016.

3 Respectfully submitted this 25th day of March 2016.

4 AGWARA & ASSOCIATES	WILLIAM C. SILVIS Assistant Director
5 <u>/s/ Liborius Agwara</u>	<u>/s/ T. Monique Peoples</u>
6 LIBORIUS AGWARA	T. MONIQUE PEOPLES
7 4693 E. Flamingo Road	Trial Attorney
8 Las Vegas, Nevada 89121	<i>Attorneys for Respondents</i>
9 (702) 385-4800	
agwaralaw@yahoo.com	
<i>Attorneys for Petitioner</i>	

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13 IT IS SO ORDERED:

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15 UNITED STATES DISTRICT JUDGE
16 Dated: March 25, 2016.
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